

## REMARKS/ARGUMENTS

Claims 1-22 are currently pending in the present patent application. Claim 8 is amended.

### **Rejection of claim 8 under 35 U.S.C. § 112.**

Claim 8 has been amended to overcome the rejection with respect to antecedent basis.

### **Rejection of claims 1,7, and 22 under 35 U.S.C. § 102(b) as being anticipated by de Vries, U.S. Patent No. 6,433,444 (hereinafter, “deVries”)**

With respect to claim 1, the applicant notes that within the range of text cited by the examiner, deVries states, “In normal operation, all the power requirements of the system are supplied by power modules 203-205. If one of power modules 203-205 fails, however, power from alternate power module 206 is seamlessly integrated by transfer modules 208-210 into the final power output of the system.” (C:3, L:22-27) In contrast, claim 1 recites, “an interconnect arrangement including a plurality of interconnects, the interconnects connecting each load to one or more sources of both the first and second groups of sources so as to be fully powered by sources of both the first and second groups of sources and such that if any one source or all sources of one of the groups of sources fails, all of the loads remain fully powered.” [emphasis added].

In other words, deVries apparently relies on transfer modules 208, 209, 210 quickly sensing a power drop-out from a corresponding primary power module 203, 204, 205, and then quickly switching to an alternate power module 206, 207 to “seamlessly integrate” the power flow into the final power output. Claim 1 recites “each load [is connected] to one or more sources of both the first and second groups of sources.” Thus, according to the present application, it is not necessary to quickly switch in an alternate power module to maintain full power at the loads.

DeVries thus does not disclose or reasonably suggest all the limitations of claim 1. The applicant respectfully asserts that claim 1 is allowable over deVries for at least this reason. Claim 7 depends from claim 1 and is also allowable over deVries for at least the reasons given for claim 1.

Claim 22 is allowable for reasons similar to those given for claim 1. Specifically, claim 22 recites, “connecting each load to one or more sources of both the first and second groups of sources to enable sources of both the first and second groups of sources to fully power the loads and such that if any one or more of the sources of one of the groups of sources fails, all of the loads remain fully powered.” As explained above, the examiner has not shown DeVries to disclose or reasonably suggest the recited limitation.

**Rejection of claims 2-6 and 8-21 under 35 U.S.C. § 103(a) as being anticipated by de Vries in view of Bobry, U.S. Patent No. 5,94,793 (hereinafter, “Bobry)**

As explained above, deVries does not disclose or reasonably suggest all the limitations of claim 1. The examiner apparently relies on Bobry to disclose that one of the two groups of sources are DC sources. The examiner has thus not shown Bobry to supply the missing disclosure. Specifically, the examiner has not shown deVries or Bobry, in combination or alone, to disclose or reasonably suggest “an interconnect arrangement including a plurality of interconnects, the interconnects connecting each load to one or more sources of both the first and second groups of sources so as to be fully powered by sources of both the first and second groups of sources and such that if any one source or all sources of one of the groups of sources fails, all of the loads remain fully powered,” [emphasis added] as recited by claim 1. Claims 2-6 and 8-10 depend from claim 1 and are also allowable for at least this reason.

Claim 11 is allowable for reasons similar to those given for claim 1. Specifically, deVries and Bobry, alone and in combination, have not been shown to disclose or reasonably suggest, “a plurality of interconnects that connect each load to one or more sources of both the group of AC sources and the group of DC sources to be fully powered by sources of both the group of AC sources and the group of DC sources and such that if any one or more sources of either the group of AC sources or the group of DC sources fails, all of the loads will remain fully powered,” as recited by claim 11.

Claims 12-21 depend from claim 11 and are also allowable for at least the reasons given for claim 11.

The present patent application is in condition for allowance. Favorable consideration and a Notice of Allowance are respectfully requested. Should the Examiner have any further questions about the application, Applicant respectfully requests the

Examiner to contact the undersigned attorney at (425) 455-5575 to resolve the matter.

Respectfully submitted,

GRAYBEAL JACKSON HALEY LLP



---

Christopher A. Wiklof  
Registration No. 43,990  
155 – 108<sup>th</sup> Avenue NE, Suite 350  
Bellevue, WA 98004-5973  
(425) 455-5575 Phone  
(425) 455-5575 Fax